

Integrated Permit Process Example

Significant Revision
Part 70 Facility

Current Facility

- Facility is a PSD and (ozone) NAA major
- Has a current part 70 operation permit that is 135 pages long
- Condensed to highlight the section that is actually being revised
 - Title page
 - Preamble
 - Part I, Section BQ



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Proposed Project

- Facility wants to modify the glass melting furnace identified in section BQ of the permit
 - MTE for PM will increase
 - Allowable PM emissions will increase
 - Adding control (process previously uncontrolled)

- Application for construction permit submitted
 - The modification is not subject to permitting under NR 405/408
 - Minor modification to a major source.



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- Application for significant operation permit revision with construction permit application
 - Applicant wants to begin construction ASAP
 - Conflict between current PM limit and new proposed higher PM limit

Permit Documents

- Initial version of draft and final permits to illustrate the concept
- Temporary conditions in one section of permit
- Legal language is not final
- Format/structure of the permit is not final
- Suggestions related to language, structure, format, etc?

Permit Application Review

- Application is reviewed by DNR
- “Preliminary Determination” and Draft Construction Permit/Draft Operation Permit Revision
- Public notice published to begin the 30 comment period
- Draft construction/operation permit sent to the applicant
- Draft revision to operation permit - section BQ is replaced with a new section BQ



Construction Permit

- Final construction permit issued after the 30 day comment period
- Construction can now commence
- If able to comply with the existing operation permit, operation also allowed



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Operation Permit

- Proposed permit to EPA
- After EPA 45 day comment period final operation permit (revision) issued
- Operation permit issued even if source not yet constructed
- The revision replaces section BQ with the new section BQ (effective upon notification)
- Proposal is to mail out only the revised section(s), unless applicant requests or DNR desires otherwise in a particular case.
- Modified unit can now operate under the provisions of revised permit



- Language to incorporate revised section
 - Use construction permit revision language as a model?
 - The permit is revised as follows:...
 - All other terms and conditions of the permit are not affected hereby
 - Please attach this document to your air pollution control permit.

- Transition language in temporary section of permit
 - Prior to modifying, comply with old operation permit (460032870-P01), condition 4
 - Revised (construction permit) notification of start-up in condition 2